



EPA
State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Southeast Region Annex
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August 8, 2000

Ms. Judy Nass
International Flavors & Fragrances, Inc.
PO Box 774
Menomonee Falls, WI 53051

File Ref: FID# 268557630
HW/CME

SUBJECT: Hazardous Waste Inspection - Notice of Noncompliance

Dear Ms. Nass:

Enclosed is a copy of the inspection form that was completed for International Flavors & Fragrances, Inc. (IFF) located at N92 W14350 Anthony Avenue in Menomonee Falls, Wisconsin on June 21, 2000.

At the time of the inspection, it was found that IFF was not in compliance with the hazardous waste small quantity generator requirements stated in Chapters NR 600-685, Wisconsin Administrative Code.

Identified below is the alleged area of noncompliance with Chapters NR 600-685, Wis. Admin. Code and the action needed to resolve the apparent violation.

1. Within 180 days of generating a waste, a small quantity generator shall ship the waste off-site to an approved facility, as required in NR 610.08(1)(n)1, Wisconsin Administrative Code. At the time of the inspection, one drum of waste solvent was stored in the north flammable room. The drum was marked with a fill start date of August 16, 1999. The north flammable room is not a satellite accumulation area since it is not the point of generation and is not under operator control. IFF should ship the drum of waste to an approved facility as soon as possible.

At the time of the inspection, we discussed the hazardous waste generator classification of the Flavors Division. Due to the sporadically low waste generation rates, IFF may want to consider using smaller containers for accumulating hazardous waste since establishing satellite accumulation areas is unlikely. Also, if IFF determines that waste generation rates consistently remain below the small quantity generator limit of 220 pounds a month, you should submit a subsequent notification to the Department as a very small quantity generator.

Within 30 days of the date of this letter, please send me a copy of the manifest for the shipment of the above-mentioned container to document that the 180-day accumulation requirement is being met. If I can be of any assistance in providing guidance to help you meet this standard, please feel free to contact me at (414) 229-0841.



Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "Sandra Miller".

Sandra Miller, CHMM
Waste Management Specialist
Southeast Region

c: SER File
BWM-WA/3